

## United States District Court

SOUTHERN

DISTRICT OF  
McALLEN DIVISION

TEXAS

UNITED STATES OF AMERICA

V.

## CRIMINAL COMPLAINT

Case Number:

M-19-0076-M

Paola Zaleta-Hernandez

PRINCIPAL

YOB: 1990

Mexico

Gerson Moises Borjas-Garcia

CO-PRINCIPAL

YOB: 1997

Honduras

Sergio Almazan-Soto

CO-PRINCIPAL

YOB: 1989

Mexico

Mario Alberto Torres-Bolanos

CO-PRINCIPAL

YOB: 1986

Mexico

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about January 9, 2019 in Hidalgo County, in the Southern District of Texas defendants(s) did,  
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Kenia Maricela Medina-Carrasco, citizen of Honduras and Hadey Abigail Gomez-Chavez, citizen of El Salvador, along with fifty-five (55) other undocumented aliens, for a total of fifty-seven (57), who had entered the United States in violation of law, concealed, harbored or shielded from detection or attempted to conceal, harbor, or shield from detection such aliens in any place, including any building or means of transportation, to-wit: a residence located in Edinburg, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(iii) FELONY

I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On December 12, 2018, Border Patrol Agents (BPA) received information of a suspected stash house in Edinburg, Texas.

On January 9, 2019 BPAs conducted surveillance on the targeted house and observed several subjects in the rear of the house. Shortly after, a black sports utility vehicle (SUV) was seen arriving to the property. One male subject exited the house and boarded the SUV; the vehicle then drove away from the house. Agents then requested assistance from the Hidalgo County Sheriff's Office. A Deputy responded and observed the driver of the black SUV make a traffic violation and proceeded to conduct a traffic stop on the SUV.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Approved by Robert Guerra  
ALISA

Sworn to before me and subscribed in my presence,

January 11, 2019 - 9:22 a.m.

Date

Juan F. Alanis, U. S. Magistrate Judge  
Name and Title of Judicial Officer

Signature of Complainant

Gerardo Montalvo Senior Patrol Agent

Printed Name of Complainant

at McAllen, Texas

City and State

Signature of Judicial Officer

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS**

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Sergio Almazan-Soto  
Mario Alberto Torres-Bolanos**

**CONTINUATION:**

BPA's arrived on scene and approached the occupants of the vehicle. The driver was identified as Paola Zaleta-Hernandez and the passenger, Gerson Moises Borjas-Garcia. Agents identified themselves as Border Patrol Agents and questioned both subjects regarding the harboring of illegal aliens (IA). Both subjects freely admitted to being in the United States illegally and admitted they had knowledge of illegal aliens being housed in the stash house. Both occupants were read their Miranda Rights and placed under arrest. Borjas told Agents he resided in the stash house and granted written consent to search his property. Borjas stated there was sixty (60) or more IAs currently being harbored at the house. Borjas also stated he left the house in charge to a brush guide he called "Venado". Borjas stated "Venado" had the remote to access the property gate.

With the consent from Borjas, Agents and Deputies proceeded to enter the house and encountered fifty-eight (58) subjects inside the stash house. All subjects were determined to be illegally present in the United States. The subjects were asked if they had knowledge of the remote access for the gate and one subject named Sergio Almazan-Soto, later identified as "Venado", told Agents he knew where it could be found. Almazan told Agents that Borjas had handed him the remote.

All subjects were transported to the Rio Grande Valley Centralized Processing Center for processing. After interviewing the principals and material witnesses from this case, it was determined that there was another man in charge as the main coordinator, later identified as Mario Alberto Torres-Bolanos (also known as "Camaron"). Borjas confirmed who "Camaron" was through a photograph in his phone. Agents obtained the address of another stash house location where "Camaron" could be found.

On January 10, 2019, Agents conducted surveillance on the suspected stash house and observed a vehicle depart the location. Agents requested assistance from the Hidalgo County Sheriff's Office. A Deputy responded and observed the driver of the vehicle make a traffic violation and proceeded to conduct a traffic stop. The passenger of the vehicle was identified as Mario Alberto Torres-Bolanos (also known as "Camaron"), a citizen of Mexico illegally present in the United States. "Camaron" was placed under arrest and was transported to the Border Patrol Station for processing.

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**CONTINUATION:  
PRINCIPAL STATEMENTS:**

Mario Alberto Torres-Bolanos, Paola Zaleta-Hernandez, Gerson Moises Borjas-Garcia, and Sergio Almazan-Soto, and were read their Miranda Rights. They understood their rights and each provided a sworn statement.

**PRINCIPAL #1:**

Torres, a citizen of Mexico, stated he had been smuggling aliens for about two months. Torres claims that he smuggled undocumented aliens to the house where Border Patrol Agents apprehended 50 to 60 undocumented aliens. Torres admitted he transported the undocumented aliens and took food to the stash house with the help of a woman. Torres admitted that the woman also transported the aliens and would take food to the stash house. Torres told Agents he had a caretaker at the stash house and was trying to find guides to walk the undocumented aliens further north.

Torres identified Paola, through a photo lineup, as the woman that helped him transport the aliens and take food to the stash house.

Torres identified Almazan, through a photo lineup, as the brush guide he transported to the stash house.

Torres identified Borjas, through a photo lineup, as the caretaker of the stash house.

**PRINCIPAL #2:**

Paola, a citizen of Mexico, stated she illegally entered the United States about three years ago. Paola was asked how she got involved in alien smuggling and stated that a Mexican man named "Cameron" offered her a job to take food to illegal aliens. Paola accepted the offer in exchange for a free trip to Tennessee that would normally cost \$2,500 USD. Paola stated she picked up illegal aliens from "Cameron" about ten times. Paola admitted she took a total of fifteen illegal aliens to the stash house. Paola stated "Cameron" would instruct her to take away the alien's cell phones. "Cameron" would give her \$150 USD to buy food and would keep \$25 USD to put gas in her vehicle. Paola stated she took food to the illegal aliens at least fifteen different times. Paola stated that a man by the name of "Flaco" would grab the food and take it inside. Paola also stated that "Flaco" would write the names of illegal aliens in a notebook. Paola stated that "Flaco" was staying at that house and that "Cameron" was renting it. Paola also stated that a foot guide named "El Venado" was going to take the group up north.

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**CONTINUATION:**

Paola identified Gerson Moises Borjas-Garcia, through a photo lineup, as “Flaco” and as the person who would care for the illegal aliens.

Paola identified Sergio Almazan-Soto, through a photo lineup, as the brush guide for the illegal aliens.

**PRINCIPAL #3:**

Borjas, a citizen of Honduras, stated he illegally entered the United States about three months ago. Borjas stated he was taken to a house where he met Paola. Borjas stayed at Paola’s home for about a month. During his time at the stash house, Borjas stated he started working for Paola and would assist her in taking food to the illegal aliens (IAs) and would also accompany Paola in transporting illegal aliens. Borjas admitted to being paid \$200 or \$300 USD several times by Paola.

Borjas stated he was then offered a job as a caretaker by “Cameron”, the man that would take undocumented aliens to Paola. Borjas accepted the job and was taken to the stash house. Borjas stated “Cameron” paid him \$100 USD. At the stash house, Borjas kept a ledger with the names of the undocumented aliens. Borjas stated “Cameron” and Paola would drop off IAs and food at the stash house. Borjas would also accompany Paola to purchase the food. Borjas stated that foot guides would go to the house as well to walk groups further north; he further stated that this time around, “Cameron” dropped off a foot guide, which he identified as Almazan.

Borjas identified Paola Zaleta-Hernandez, through a photo lineup, as the woman that would bring food and transport aliens to the house.

Borjas identified Sergio Almazan-Soto, through a photo lineup, as the brush guide for the illegal aliens.

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**CONTINUATION:  
PRINCIPAL #4:**

Almazan, a citizen of Mexico, stated he crossed illegally into the United States. Almazan claims his brother paid \$1,800 USD and made his smuggling arrangements. He crossed the river along with five others and were guided using a cell phone. They were eventually picked up and transferred into a Tundra pickup truck driven by a man named "Cameron". Once they got to the stash house, "Cameron" called a man by the name of "Flaco", later identified as Borjas, to open the property's gate. Almazan stated Borjas was the caretaker and told them to go inside and not make too much noise. Almazan observed Borjas leave with a woman that dropped off food to the house. Almazan admitted that Borjas showed him where the remote for the gate was located so he could open it. Almazan claimed he used to be a foot guide but no longer guided groups since his last apprehension. Almazan also stated he told others in the house he used to be foot guide.

Almazan identified Gerson Moises Borjas-Garcia, through a photo lineup, as the caretaker of the stash house.

Almazan identified Paola Zaleta-Hernandez, through a photo lineup, as the woman that would take food and pickup Borjas.

**MATERIAL WITNESS STATEMENTS:**

Hadey Abigail Gomez-Chavez and Kenia Maricela Medina-Carrasco were read their Miranda Rights. Both understood their rights and each provided a sworn statement.

Gomez, a citizen of El Salvador, stated she crossed illegally into the United States. Her family made the smuggling arrangements and paid \$5,000 USD. After crossing the river, Gomez stated she was transported to the stash house in a pickup truck driven by a male subject. At the stash house, the driver told them to get off and go inside the house with him. Gomez stated there was about 80 illegal aliens in the house when she first got to the house. A man, identified as Borjas, wrote down their names in a ledger. Gomez also observed a woman, identified as Paola, take food to the house. Gomez also stated she heard there was a foot guide in the house nicknamed "El Venado". Gomez also stated there was another man that would take only females to another house. The man asked Gomez if she wanted to go with him but she refused.

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**CONTINUATION:**

Gomez identified Gerson Moises Borjas-Garcia, through a photo lineup, as the person in charge of the stash house that wrote names in a ledger.

Gomez identified Paola Zaleta-Hernandez, through a photo lineup, as the person that would take people and bring food to the house.

Medina, a citizen of Honduras, stated she crossed illegally into the United States. After crossing the river, a woman, identified as Paola, picked her up and took her to the stash house. Paola told her to get off the vehicle and go inside the house with her. Medina saw Paola several times when she dropped off food at the house. Medina claims that a Mexican man, identified as Borjas, was in charge of the house. Medina stated Borjas would let them know when they were going to bring food and possessed the entry gate remote control. Medina stated a man nicknamed "Cameron" wrote down her name in a ledger. "Cameron" also told her that a person nicknamed "El Venado" was the brush guide that would be taking her on the next group that left. When "El Venado" arrived, he told them that he would guide them.

Medina identified Gerson Moises Borjas-Garcia, through a photo lineup, as the caretaker of the stash house.

Medina identified Paola Zaleta-Hernandez, through a photo lineup, as the woman that transported aliens to the stash house and would drop off food.

Medina identified Sergio Almazan-Soto, through a photo lineup, as the brush guide.